

217/785-1705

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT -- RENEWAL

PERMITTEE

Ball Aerosol & Specialty Container, Inc.
Attn: Alan R. Gans
400 Eastgate Drive
Danville, Illinois 61832

Application No.: 06020004

I.D. No.: 183020AFK

Applicant's Designation: FESOP

Date Received: September 28, 2012

Subject: Metal Can Manufacturing

Date Issued: September 12, 2014

Expiration Date: September 12, 2024

Location: 400 Eastgate Drive, Danville, Vermillion County

This permit is hereby granted to the above-designated Permittee to OPERATE emission unit(s) and/or air pollution control equipment consisting of five (5) Side Seam Spray Coating Lines with two (2) 1.28 mmBtu/hour natural gas-fired curing ovens (Lines #4 and #5), a parts cleaning station, eight (8) tab lube (metal punching) processes, a drum room (spray gun cleaning), and seven (7) videojet printers pursuant to the above-referenced application. This Permit is subject to standard conditions attached hereto and the following special condition(s):

- 1a. This federally enforceable state operating permit is issued to limit the emissions of air pollutants from the source to less than major source thresholds (i.e., 100 tons/year for Volatile Organic Material (VOM)). As a result, the source is excluded from the requirements to obtain a Clean Air Act Permit Program (CAAPP) permit. The maximum emissions of this source, as limited by the conditions of this permit, are described in Attachment A.
- b. Prior to issuance, a draft of this permit has undergone a public notice and comment period.
- c. This permit supersedes all operating permit(s) for this location.
- 2a. Pursuant to 35 Ill. Adm. Code 212.123(a), no person shall cause or allow the emission of smoke or other particulate matter, with an opacity greater than 30 percent, into the atmosphere from any emission unit other than those emission units subject to 35 Ill. Adm. Code 212.122.
- b. Pursuant to 35 Ill. Adm. Code 212.123(b), the emission of smoke or other particulate matter from any such emission unit may have an opacity greater than 30 percent but not greater than 60 percent for a period or periods aggregating 8 minutes in any 60 minute period provided that such opaque emissions permitted during any 60 minute period shall occur from only one such emission unit located within a 305 meter (1000 foot) radius from the center point of any other such emission unit owned or operated by such person, and provided further that such opaque emissions permitted from each such emission unit shall be limited to 3 times in any 24 hour period.

- c. Pursuant to 35 Ill. Adm. Code 212.321(a), except as further provided in 35 Ill. Adm. Code Part 212, no person shall cause or allow the emission of particulate matter into the atmosphere in any one hour period from any new process emission unit which, either alone or in combination with the emission of particulate matter from all other similar process emission units for which construction or modification commenced on or after April 14, 1972, at a source or premises, exceeds the allowable emission rates specified in 35 Ill. Adm. Code 212.321(c).
- 3. Pursuant to 35 Ill. Adm. Code 214.301, except as further provided by 35 Ill. Adm. Code Part 214, no person shall cause or allow the emission of sulfur dioxide into the atmosphere from any process emission source to exceed 2000 ppm.
- 4a. Pursuant to 35 Ill. Adm. Code 215.204(b)(5), no owner or operator of a coating line shall cause or allow the emission of volatile organic material to exceed the following limitations on coating materials, excluding water and any compounds which are specifically exempted from the definition of volatile organic material pursuant to 35 Ill. Adm. Code Part 215, delivered to the coating applicator:

| | | |
|----------------------|-------------|---------------|
| Can Coating | <u>kg/l</u> | <u>lb/gal</u> |
| Side seam spray coat | 0.66 | (5.5) |

- b. Pursuant to 35 Ill. Adm. Code 215.301, no person shall cause or allow the discharge of more than 3.6 kg/hour (8 lbs/hour) of organic material into the atmosphere from any emission source, except as provided in 35 Ill. Adm. Code 215.302, 215.303, 215.304 and the following exception: If no odor nuisance exists the limitation of 35 Ill. Adm. Code Part 215 Subpart K (Use of Organic Material) shall apply only to photochemically reactive material.
- 5. This permit is issued based on the source not being subject to the New Source Performance Standard (NSPS) for the Beverage Can Surface Coating Industry, 40 CFR 60 Subpart WW, because the source does not perform coating of beverage cans.
- 6. This permit is issued based on the source not being subject to the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Surface Coating of Metal Cans, 40 CFR 63 Subpart KKKK, because this source is not a major source, is not located at a major source, and is not part of a major source of emissions of hazardous air pollutants (HAP).
- b. This permit is issued based on the Side Seam Spray Coating Lines at this source not being subject to the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Paint Stripping And Miscellaneous Surface Coating at Area Sources, 40 CFR Part 63 Subpart HHHHHH because the Can Assembly Lines at this source will not be used to perform spray application of coatings that contain the target HAP, as defined in 40 CFR 63.11180 as compounds of chromium (Cr), lead (Pb), manganese (Mn),

nickel (Ni), or cadmium (Cd), to any part or product made of metal or plastic or combinations of metal and plastic that are not motor vehicles or mobile equipment.

- c. The spray booths associated with the Side Seam Spray Coating Lines are not subject to National Emission Standards for Hazardous Air Pollutants (NESHAP) Area Source Standards for Nine Metal Fabrication and Finishing Source Categories, 40 CFR 63 Subpart XXXXXX because the spray-applied painting operations do not use paints which contain metal fabrication or finishing metal HAP (MFHAP), defined to be the compounds of cadmium, chromium, lead, manganese, and nickel, or any of these metals in the elemental form with the exception of lead. Materials that contain MFHAP are defined to be materials that contain greater than 0.1 percent for carcinogens, as defined by OSHA at 29 CFR 1910.1200(d)(4), and greater than 1.0 percent for noncarcinogens. For the MFHAP, this corresponds to materials that contain cadmium, chromium, lead, or nickel in amounts greater than or equal to 0.1 percent by weight (of the metal), and materials that contain manganese in amounts greater than or equal to 1.0 percent by weight (of the metal), as shown in formulation data provided by the manufacturer or supplier, such as the Material Safety Data Sheet for the material.
- 7. Pursuant to 35 Ill. Adm. Code 215.209, no coating line subject to the limitations of 35 Ill. Adm. Code 215.204 is required to meet 35 Ill. Adm. Code 215.301 or 215.302 after the date by which the coating line is required to meet 35 Ill. Adm. Code 215.204.
- 8a. Pursuant to 35 Ill. Adm. Code 215.182(a), no person shall operate a cold cleaning degreaser unless:
 - i. Waste solvent is stored in covered containers only and not disposed of in such a manner that more than 20 percent of the waste solvent (by weight) is allowed to evaporate into the atmosphere;
 - ii. The cover of the degreaser is closed when parts are not being handled; and
 - iii. Parts are drained until dripping ceases.
- b. Pursuant to 35 Ill. Adm. Code 215.182(b), no person shall operate a cold cleaning degreaser unless:
 - i. The degreaser is equipped with a cover which is closed whenever parts are not being handled in the cleaner. The cover shall be designed to be easily operated with one hand or with the mechanical assistance of springs, counterweights, or a powered system if:
 - A. The solvent vapor pressure is greater than 2 kPa (15 mmHg or 0.3 psi) measured at 38°C (100°F);

- B. The solvent is agitated; or
- C. The solvent is heated above ambient room temperature.
- ii. The degreaser is equipped with a facility for draining cleaned parts. The drainage facility shall be constructed so that parts are enclosed under the cover while draining unless:
 - A. The solvent vapor pressure is less than 4.3 kPa (32 mmHg or 0.6 psi) measured at 38°C (100°F); or
 - B. An internal drainage facility cannot be fitted into the cleaning system, in which case the drainage facility may be external.
- iii. The degreaser is equipped with one of the following control devices if the vapor pressure of the solvent is greater than 4.3 kPa (32 mmHg or 0.6 psi) measured at 38°C (100 1/4 F) or if the solvent is heated above 50°C (120°F) or its boiling point:
 - A. A freeboard height of 7/10 of the inside width of the tank or 91 cm (36 in), whichever is less; or
 - B. Any other equipment or system of equivalent emission control as approved by the Agency. Such a system may include a water cover, refrigerated chiller or carbon adsorber.
- iv. A permanent conspicuous label summarizing the operating procedure is affixed to the degreaser; and
- v. If a solvent spray is used, the degreaser is equipped with a solid fluid stream spray, rather than a fine, atomized or shower spray.
- 9a. In the event that the operation of this source results in an odor nuisance, the Permittees shall take appropriate and necessary actions to minimize odors, including but not limited to, changes in raw material or installation of controls, in order to eliminate the nuisance.
- b. The Line #4 and #5 curing ovens shall only be operated with natural gas as the fuel. The use of any other fuel in either the Line #4 or #5 curing oven requires that the Permittee first obtain a construction permit from the Illinois EPA and then perform stack testing to verify compliance with all applicable requirements.
- 10a. Emissions and operation of the five (5) can coating lines shall not exceed the following limits:

| <u>Emission Unit</u> | <u>Material Usage</u> | | <u>VOM Emissions</u> | | <u>PM Emissions</u> | |
|----------------------|-----------------------|-----------------|----------------------|------------------|---------------------|------------------|
| | <u>(Lbs/Mo)</u> | <u>(Lbs/Yr)</u> | <u>(Tons/Mo)</u> | <u>(Tons/Yr)</u> | <u>(Tons/Mo)</u> | <u>(Tons/Yr)</u> |
| Line #1 | 1,914 | 19,138 | 0.67 | 6.71 | 0.32 | 3.16 |
| Line #2 | 2,287 | 22,873 | 0.77 | 7.69 | 0.38 | 3.77 |
| Line #3 | 2,163 | 21,623 | 0.73 | 7.27 | 0.36 | 3.57 |
| Line #4 | 3,833 | 38,328 | 1.34 | 13.43 | 0.63 | 6.32 |
| Line #5 | 3,716 | 37,155 | 1.30 | 13.02 | 0.62 | 6.13 |
| | | | Totals: | 48.12 | | 22.95 |

These limits are based on the maximum material usage rates and the highest VOM content of these materials.

- b. Emissions and operation of the Parts Cleaning, Tab Lube, and Drum Room (Spray Gun Cleaner) shall not exceed the following limits:

| <u>Material</u> | <u>Material Usage</u> | | <u>Total VOM (Wt. %)</u> | <u>VOM Emissions</u> | |
|-------------------------------|-----------------------|-----------------|--------------------------|----------------------|------------------|
| | <u>(Lbs/Mo)</u> | <u>(Lbs/Yr)</u> | | <u>(Tons/Mo)</u> | <u>(Tons/Yr)</u> |
| Parts Cleaning | 713 | 7,693 | 100.0 | 0.39 | 3.85 |
| Tab Lube | 425 | 4,592 | 86.0 | 0.20 | 1.97 |
| Drum Room (Spray Gun Cleaner) | 70.7 | 1,061 | 100.0 | 0.05 | 0.53 |
| | | | | Total | 6.35 |

These limits are based on the maximum material usage rates and the highest VOM content of these materials.

- c. Emissions and operation of the Video Jet Printing shall not exceed the following limits:

| <u>r Material</u> | <u>Material Usage</u> | | <u>Total VOM (Wt. %)</u> | <u>VOM Emissions</u> | |
|-----------------------|-----------------------|-----------------|--------------------------|----------------------|------------------|
| | <u>(Lbs/Mo)</u> | <u>(Lbs/Yr)</u> | | <u>(Tons/Mo)</u> | <u>(Tons/Yr)</u> |
| Ink | 14.6 | 146 | 74 | 0.01 | 0.05 |
| UV Ink | 27.0 | 270 | 69 | 0.01 | 0.09 |
| Make Up Fluid | 166.8 | 1,668 | 100 | 0.08 | 0.84 |
| | | | | Total: | 0.98 |

These limits are based on the maximum material usage rates and the highest VOM content of these materials.

- d. Emissions and operation of the natural gas-fired ovens (combined) shall not exceed the following limits:

- i. Natural Gas Usage:

| <u>(mmscf/Month)</u> | <u>(mmscf/Year)</u> |
|----------------------|---------------------|
| 1.5 | 14.9 |

- ii. Emissions from the combustion of natural gas:

| <u>Pollutant</u> | <u>(lbs/mmscf)</u> | <u>Emissions</u> | |
|------------------------------------|--------------------|---------------------|--------------------|
| | | <u>(Tons/Month)</u> | <u>(Tons/Year)</u> |
| Carbon Monoxide (CO) | 84.0 | 0.06 | 0.63 |
| Nitrogen Oxides (NO _x) | 100.0 | 0.08 | 0.75 |
| Particulate Matter (PM) | 7.6 | 0.01 | 0.06 |
| Sulfur Dioxide (SO ₂) | 0.6 | 0.01 | 0.01 |
| Volatile Organic Material (VOM) | 5.5 | 0.01 | 0.04 |

These limits are based on the maximum total firing rate (1.7 mmBtu/hour), maximum operating hours (8,760 hours/year), and standard emission factors (Tables 1.4-1 and 1.4-2, AP-42, Fifth Edition, Volume I, Supplement D, July 1998).

- e. Compliance with the annual limits of this permit shall be determined on a monthly basis from the sum of the data for the current month plus the preceding 11 months (running 12 month total).
11. This permit is issued based on the Potential to Emit (PTE) for Hazardous Air Pollutants (HAP) as listed in Section 112(b) of the Clean Air Act from the source being less than 10 tons/year of any single HAP and 25 tons/year of any combination of such HAPs. As a result, this permit is issued based on the emissions of all HAPs from this source not triggering the requirements to obtain a Clean Air Act Permit Program (CAAPP) Permit and Section 112(g) of the Clean Air Act.
- 12a. Pursuant to 35 Ill. Adm. Code 201.282, every emission source or air pollution control equipment shall be subject to the following testing requirements for the purpose of determining the nature and quantities of specified air contaminant emissions and for the purpose of determining ground level and ambient air concentrations of such air contaminants:
- i. Testing by Owner or Operator. The Illinois EPA may require the owner or operator of the emission source or air pollution control equipment to conduct such tests in accordance with procedures adopted by the Illinois EPA, at such reasonable times as may be specified by the Illinois EPA and at the expense of the owner or operator of the emission source or air pollution control equipment. The Illinois EPA may adopt procedures detailing methods of testing and formats for reporting results of testing. Such procedures and revisions thereto, shall not become effective until filed with the Secretary of State, as required by the APA Act. All such tests shall be made by or under the direction of a person qualified by training and/or experience in the field of air pollution testing. The Illinois EPA shall have the right to observe all aspects of such tests.
- ii. Testing by the Illinois EPA. The Illinois EPA shall have the right to conduct such tests at any time at its own expense. Upon

request of the Illinois EPA, the owner or operator of the emission source or air pollution control equipment shall provide, without charge to the Illinois EPA, necessary holes in stacks or ducts and other safe and proper testing facilities, including scaffolding, but excluding instruments and sensing devices, as may be necessary.

- b. Testing required by Condition 13 shall be performed upon a written request from the Illinois EPA by a qualified independent testing service.
- 13a. Pursuant to 35 Ill. Adm. Code 215.208(a), the VOM content of coatings shall be determined by Method 24, 40 CFR Part 60, Appendix A, except for glues and adhesive coatings, two component reactive coatings forming volatile reaction products, coatings requiring energy other than heat to initiate curing, and coatings requiring high temperature catalysis for curing, providing the person proposing testing of the material submits to the Illinois EPA proof that the Method 24 results would not be representative and proof that a proposed alternative test method gives representative, accurate test results. For printing inks, the volatile organic material content shall be determined by Method 24A, 40 CFR Part 60, Appendix A. Any alternate test method must be approved by the Illinois EPA which shall consider data comparing the performance of the proposed alternative to the performance of the approved test method(s). If the Illinois EPA determines that such data demonstrates that the proposed alternative will achieve results equivalent to the approved test method(s), the Illinois EPA shall approve the proposed alternative.
- b. Pursuant to 35 Ill. Adm. Code 215.208(b), transfer efficiency shall be determined by a method, procedure or standard approved by the USEPA, under the applicable new source performance standard or until such time as USEPA has approved and published such a method, procedure or standard, by any appropriate method, procedure or standard approved by the Illinois EPA.
14. Pursuant to 40 CFR 63.10(b)(3), if an owner or operator determines that his or her stationary source that emits (or has the potential to emit, without considering controls) one or more hazardous air pollutants regulated by any standard established pursuant to Section 112(d) or (f) of the Clean Air Act, and that stationary source is in the source category regulated by the relevant standard, but that source is not subject to the relevant standard (or other requirement established under 40 CFR Part 63) because of limitations on the source's potential to emit or an exclusion, the owner or operator must keep a record of the applicability determination on site at the source for a period of 5 years after the determination, or until the source changes its operations to become an affected source, whichever comes first. The record of the applicability determination must be signed by the person making the determination and include an analysis (or other information) that demonstrates why the owner or operator believes the source is unaffected (e.g., because the source is an area source). The analysis

(or other information) must be sufficiently detailed to allow the USEPA and/or Illinois EPA to make a finding about the source's applicability status with regard to the relevant standard or other requirement. If relevant, the analysis must be performed in accordance with requirements established in relevant subparts of 40 CFR Part 63 for this purpose for particular categories of stationary sources. If relevant, the analysis should be performed in accordance with USEPA guidance materials published to assist sources in making applicability determinations under Section 112 of the Clean Air Act, if any. The requirements to determine applicability of a standard under 40 CFR 63.1(b)(3) and to record the results of that determination under 40 CFR 63.10(b)(3) shall not by themselves create an obligation for the owner or operator to obtain a Title V permit.

- 15a. The Permittee shall maintain records of the following items so as to demonstrate compliance with the limits of this permit:
- i. Name and amount of each cleaning solvent, lubricant, and ink used (tons/month and tons/year);
 - ii. The usage of each coating and cleaning solvent on each coating booth (gallons/month and gallons/year);
 - iii. VOM and HAP content of each coating, cleaning solvent, lubricant, and ink used (weight %);
 - iv. The density of each coating and cleaning solvent on each coating booth (lbs/gallon);
 - v. Natural gas usage for the curing ovens (mmscf/month and mmscf/year); and
 - vi. Monthly and annual CO, NO_x, PM, SO₂, VOM, and HAP emissions from the source with supporting calculations (tons/month and tons/year).
- b. All records and logs required by this permit shall be retained at a readily accessible location at the source for at least five (5) years from the date of entry and shall be made available for inspection and copying by the Illinois EPA or USEPA upon request. Any records retained in an electronic format (e.g., computer storage device) shall be capable of being retrieved and printed on paper during normal source office hours so as to be able to respond to an Illinois EPA or USEPA request for records during the course of a source inspection.
- 16a. If there is an exceedance of or a deviation from the requirements of this permit as determined by the records required by this permit, the Permittee shall submit a report to the Illinois EPA's Compliance Section in Springfield, Illinois within 30 days after the exceedance or deviation. The report shall include the emissions released in accordance with the recordkeeping requirements, a copy of the relevant

records, and a description of the exceedance or deviation and efforts to reduce emissions and future occurrences.

- b. Two (2) copies of required reports and notifications shall be sent to:

Illinois Environmental Protection Agency
Division of Air Pollution Control
Compliance Section (#40)
P.O. Box 19276
Springfield, Illinois 62794-9276

and one (1) copy shall be sent to the Illinois EPA's regional office at the following address unless otherwise indicated:

Illinois Environmental Protection Agency
Division of Air Pollution Control
2009 Mall Street
Collinsville, Illinois 62234

If you have any questions on this permit, please call Jocelyn Stakely at 217/785-1705.

Raymond E. Pilapil
Acting Manager, Permit Section
Division of Air Pollution Control

Date Signed: _____

REP:JRS:psj

cc: Illinois EPA, Region 3
Lotus Notes

Attachment A - Emissions Summary

This attachment provides a summary of the maximum emissions from the can manufacturing plant operating in compliance with the requirements of this federally enforceable permit. In preparing this summary, the Illinois EPA used the annual operating scenario, which results in maximum emissions from such a plant. The resulting maximum emissions are below the levels (100 tons/year for VOM) at which this source would be considered a major source for purposes of the Clean Air Act Permit Program. Actual emissions from this source will be less than predicted in this summary to the extent that less material is handled and control measures are more effective than required in this permit.

| <u>Emission Unit</u> | E M I S S I O N S (Tons/Year) | | | | |
|-------------------------------|-------------------------------|-----------------------|-------------|-----------------------|-------------|
| | <u>CO</u> | <u>NO_x</u> | <u>PM</u> | <u>SO₂</u> | <u>VOM</u> |
| Coating Line #1 | | | 3.16 | | 6.71 |
| Coating Line #2 | | | 3.77 | | 7.69 |
| Coating Line #3 | | | 3.57 | | 7.27 |
| Coating Line #4 | | | 6.32 | | 13.43 |
| Coating Line #5 | | | 6.13 | | 13.02 |
| Parts Cleaning | | | | | 3.85 |
| Tab Lube (Metal Punching) | | | | | 1.97 |
| Drum Room (Spray Gun Cleaner) | | | | | 0.53 |
| Video Jet Printing | | | | | 0.98 |
| Natural Gas Combustion | <u>0.63</u> | <u>0.75</u> | <u>0.06</u> | <u>0.01</u> | <u>0.04</u> |
| Totals | 0.63 | 0.75 | 23.01 | 0.01 | 55.49 |